

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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GENERAL REFRACTORIES COMPANY,

Plaintiff,

-against-

CIVIL ACTION NO. 04-3509

FIRST STATE INSURANCE CO., WESTPORT  
INSURANCE CORPORATION, f/k/a or successor  
to Puritan Insurance Company, LEXINGTON  
INSURANCE COMPANY, CENTENNIAL  
INSURANCE COMPANY, GRANITE STATE  
INSURANCE COMPANY, POTOMAC  
INSURANCE COMPANY OF ILLINOIS,  
HARTFORD ACCIDENT AND INDEMNITY CO.,  
GOVERNMENT EMPLOYEES INSURANCE CO.,  
REPUBLIC INSURANCE COMPANY, SENTRY  
INSURANCE COMPANY, f/k/a or successor to  
Vanliner Insurance Company and f/k/a or successor  
to Great SW Fire Insurance Co., AMERICAN  
INTERNATIONAL INS. CO., AIU INSURANCE  
COMPANY, HARBOR INSURANCE COMPANY,  
ST. PAUL TRAVELERS f/k/a or successor to Aetna  
Casualty and Surety Company, AMERICAN  
EMPIRE INSURANCE CO. AND ACE USA,

**DEFENDANT SENTRY  
INSURANCE COMPANY'S  
ANSWER TO CROSS-  
CLAIM BY ONEBEACON  
AMERICA INSURANCE  
COMPANY (SUCCESSOR  
TO POTOMAC  
INSURANCE COMPANY)**

Defendants.

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Defendant, SENTRY INSURANCE A MUTUAL COMPANY, s/h/a SENTRY  
INSURANCE COMPANY f/k/a or successor to Vanliner Insurance Company and f/k/a  
or successor to Great SW Fire Insurance Co., ("Sentry"), by its attorneys, Koch &  
Corboy and Rivkin Radler, LLP, hereby answers defendant OneBeacon's Cross-Claim  
as follows:

**CROSS-CLAIM**

1. Sentry denies having sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of the Cross-Claim.

2. Sentry denies having sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 2 of the Cross-Claim.

3. To the extent that the allegations in paragraph 2 constitute conclusions of law, no response is required and none is made. To the extent that paragraph 2 contains factual allegations, Sentry denies them and demands strict proof thereof.

WHEREFORE, Sentry respectfully requests that:

The Court dismiss the defendant OneBeacon's Cross-Claim with prejudice, together with attorneys' fees and costs in this action and award Sentry such other and further relief as the Court deems just and proper.

By: Wendy H. Koch

Wendy H. Koch  
I.D. 19503  
KOCH & CORBOY  
101 Greenwood Ave., Suite 460  
Jenkintown, Pennsylvania 19046  
(215) 881-2280  
wkoch@kochcorboy.com

M. Paul Gorfinkel  
Tara L. Stagg  
RIVKIN RADLER, LLP  
EAB Plaza  
Uniondale, New York 11556-0111  
(516) 357-3000

**Attorneys for Defendant  
Sentry Insurance Company**

Dated: October 12, 2004

**CERTIFICATION OF SERVICE**

I, Wendy H. Koch, hereby certify that a true and correct copy of the Answer of Defendant, Sentry Insurance a Mutual Company, to Cross-Claims of OneBeacon America Insurance Company (successor to Potomac Insurance Company) was sent by United States Mail, postage pre-paid, to all counsel and parties listed below:

Barry L. Katz, Esquire  
225 City Ave., Suite 14  
Bala Cynwyd, PA 19004

Law Offices of Suzanne H. Gross  
Suzanne H. Gross, Esquire  
225 City Ave., Suite 14  
Bala Cynwyd, PA 19004  
(610) 660-8814  
**Counsel for Plaintiff**

Howard M. Cyr, Esquire  
Harvey Pennington Cabot Griffith  
& Renneisen, Ltd. 11  
Penn Center  
1835 Market Street  
29<sup>th</sup> Floor  
Philadelphia, PA 19103  
**Counsel for Defendant First State Insurance Co.**  
**Counsel for Defendant Hartford Insurance Co.**

C. Lawrence Holmes, Esquire  
Dilworth, Paxson, LLP  
3200 The Mellon Bank Center  
1735 Market Street  
Philadelphia, PA 19103-7595  
**Counsel for Defendant Westport Insurance Corporation**

Daniel G. Cedrone, Esquire  
Bradley Mortensen, Esquire  
Christie, Pabarue, Mortensen & Young  
1880 J.F.K. Boulevard, 10<sup>th</sup> Floor  
Philadelphia, PA 19103  
**Counsel for Defendant Potomac Insurance Co. of Illinois**

Neil M. Day, Esquire  
Coughlin Duffy Kelly Lisovicz Midlige & Wolff  
350 Mt. Kemble Avenue  
P.O. Box 1917  
Morristown, NJ 07962-1917  
**Counsel for Defendant Centennial Insurance Company**

Samuel J. Area, Jr., Esquire  
Kimberly A. Hendrix, Esquire  
Stradley Ronon Stevens & Young  
2600 One Commerce Square  
Philadelphia, PA 19103-7098  
215-564-8000  
215-564-8120 – Fax  
**Counsel for Defendant, Travelers Casualty and Surety  
Company f/k/a The Aetna Casualty & Surety Company  
(incorrectly designated as St. Paul Travelers**

Marjorie A. Weiss, Esquire  
White & Williams  
1800 One Liberty Place  
1650 Market Street  
Philadelphia, PA 19103  
**Counsel for Defendant, Republic Insurance Company**

Paul M. Hummer, Esquire  
Saul Ewing LLP  
Centre Square West  
1500 Market Street  
38<sup>th</sup> Floor  
Philadelphia, PA 19102-2186  
215-972-7788  
215-972-1851 – Fax

and  
Daniel I. Schlessinger, Esquire  
Lord, Bissell & Brook LLP  
115 South LaSalle Street  
Suite 2900  
Chicago, IL 60603  
312-443-0600  
312-443-6446 – fax  
**Counsel for Defendant, American Empire Surplus  
Lines Insurance Company**

Lexington Insurance Company  
100 Summer Street  
Boston, MA 02110-2135

Granite State Insurance Company  
70 Pine Street, 3<sup>rd</sup> Floor  
New York, NY 10270

Government Employees Insurance Co.  
One GEICO Plaza  
Washington, D.C. 20076

American International Ins. Co.  
70 Pine Street  
New York, NY 10270

AIU Insurance Company  
70 Pine Street, 3<sup>rd</sup> Floor  
New York, NY 10270

*Wendy H. Koch*  
WENDY H. KOCH

DATED: October 12, 2004